

## CILENTI & COOPER, PLLC

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**MEMO ENDORSED**

July 1, 2021

### **STATUS REPORT; MOTION FOR EXTENSION OF TIME FOR DEFENDANTS TO APPEAR; REQUEST FOR REFERRAL TO MEDIATION**

#### **BY ECF**

Honorable Valerie Caproni, U.S.D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, New York 10007

**Re: Mario Altagracia v. Fer's Cleaners II Corp., et. al.  
Case No. 21 Civ. 108 (VEC)**

Dear Judge Caproni,

We are counsel to the plaintiff and we write with reference to the court's order dated June 4, 2021 [Docket 23] scheduling an in-person conference on July 6, 2021 before Your Honor. This is a joint status report and request to adjourn the conference and refer the case to mediation.

We met with defendant Felipe Espinoza in our office today. We explained the court-annexed mediation program to him. We jointly agreed that we would like to attempt mediation and respectfully ask the court to extend deadlines, including the upcoming conference and the time for Mr. Espinoza to retain counsel, while the parties attempt mediation. We ask the court to alert the mediation program that the defendant is interested in participating *pro se*.

Mr. Espinoza is copied on this correspondence via E-mail and we will promptly forward the any court orders we receive to him. Finally, we ask the court to order the parties to file a joint status report in sixty (60) days.

The Honorable Valerie Caproni, U.S.D.J.

July 1, 2021

Page 2

Thank you for your consideration of this case.

Respectfully submitted,

*/s/ Peter H. Cooper*

Peter H. Cooper

cc: Felipe Espinoza (Via E-mail: [FER11368@yahoo.com](mailto:FER11368@yahoo.com))

Application GRANTED. The conference scheduled for July 6, 2021 is canceled. This case will be referred to mediation. A joint status update is due no later than 14 days after the conclusion of mediation. Plaintiff is directed to mail a copy of this order to Defendant and note mailing on the docket.

SO ORDERED.



7/1/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE